

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE**

THE UNITED STATES OF AMERICA,

Plaintiff,

Case No. 2:18-CR-140

v.

ANDREW ASSAD,  
PETER BOLOS,  
MICHAEL PALSO,  
SYNERGY PHARMACY SERVICES INC.,  
PRECISION PHARMACY MANAGEMENT  
LLC, LARRY EVERETT SMITH,  
ALPHA-OMEGA PHARMACY LLC,  
GERMAINE PHARMACY INC.,  
ERX CONSULTANTS LLC  
dba ZOETIC PHARMACY,  
TANITH ENTERPRISES LLC  
dba MEDVEST MANAGEMENT SERVICES,  
and ULD WHOLESALE GROUP LLC,

Defendants.

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**MOTION TO WITHDRAW AS COUNSEL OF RECORD**

Pursuant to Local Rule 83.4 (g), Attorneys Dale R. Sisco and Dominic A. Isgro respectfully request leave of the Court to withdraw as attorneys of record for Alpha Omega Pharmacy, LLC; Germaine Pharmacy, Inc; and ERX Consultants, LLC dba Zoetic Pharmacy, and in support thereof state:

1. Bryan G. Holmes is the sole member of Alpha Omega Pharmacy, LLC and is authorized to act on behalf of Alpha Omega Pharmacy, LLC. Alpha Omega

Pharmacy has engaged other counsel to assume responsibility for this matter and consents to the withdrawal of Dale R. Sisco and Dominic A. Isgro.

2. In accord with Local Rule 83.4(g)(3), please find below Alpha-Omega Pharmacy, LLC's acknowledgement of consent to withdrawal signed by Bryan G. Holmes on behalf of Alpha Omega Pharmacy, LLC.

3. Kirk M. Carruthers is the sole member of ERX Consultants LLC dba Zoetic Pharmacy ("Zoetic") and is authorized to act on behalf of Zoetic. Zoetic Pharmacy has engaged other counsel to assume responsibility for this matter and has consented to the withdrawal of Dale R. Sisco and Dominic A. Isgro.

4. In accord with Local Rule 83.4(g)(3), please find below Zoetic Pharmacy's acknowledgement of consent to withdrawal signed by Kirk M. Carruthers on behalf of ERX Consultants LLC dba Zoetic Pharmacy.

5. Scott Courtney is the sole member of Germaine Pharmacy, Inc. ("Germaine") and is authorized to act on behalf of Germaine. Germaine Pharmacy has engaged other counsel to assume responsibility for this matter and has consented to the withdrawal of Dale R. Sisco and Dominic A. Isgro.

6. In accord with Local Rule 83.4(g)(3), please find below Germaine Pharmacy's acknowledgement of consent to withdrawal signed by Scott Courtney on behalf of Germaine Pharmacy, Inc.

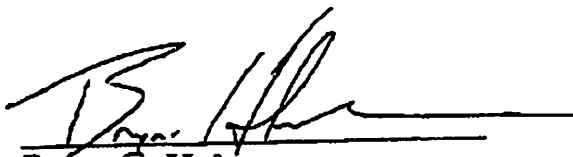
7. Stephen Ross Johnson of the firm of Ritchie, Dillard, Davies & Johnson, P.C. have filed their Notices of Appearance on behalf of Alpha Omega Pharmacy,

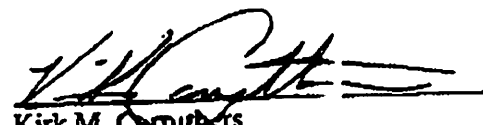
LLC [Doc. 324]; ERX Consultants LLC dba Zoetic Pharmacy[Doc. 325]; and Germaine Pharmacy, Inc. [Doc. 323].

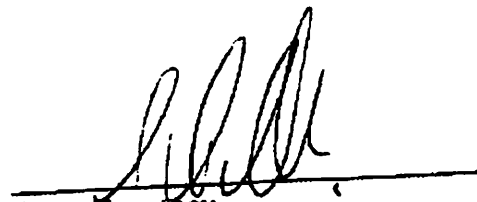
8. The Government does not object to the withdrawal of Dale R. Sisco and Dominic A. Isgro.

**Clients' Acknowledgement of Consent to Withdrawal**

By the signatures below, Alpha-Omega Pharmacy, LLC; ERX Consultants LLC dba Zoetic Pharmacy; and Germaine Pharmacy, Inc. confirm they have reviewed the Motion to Withdraw as Counsel of Record and consent to the withdrawal of Dale R. Sisco and Dominic A. Isgro in this action.

  
Bryan G. Holmes  
Alpha-Omega Pharmacy, LLC

  
Kirk M. Cucubers  
ERX Consultants LLC  
dba Zoetic Pharmacy

  
Scott Courtney  
Germaine Pharmacy, Inc.

Based on the above, Attorneys Dale R. Sisco and Dominic A. Isgro certify that the requirements of Local Rules 83.4(g) have been met.

Respectfully submitted,

SISCO-LAW

/s/ Dale R. Sisco

DALE R. SISCO

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on May <sup>21</sup>18, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notice of the electronic filing to all CM/ECF participants.

/s/ Dale R. Sisco

Attorney